

Our Ref: PC446 Metcalfe – The Co-operative, 44A Mill Road, Cambridge, rep.

Licensing Officer
Cambridge City Council,
Mandela House,
4 Regent Street,
Cambridge
CB2 1BY

Date 18/03/2021

Dear Sirs,

SUBJECT: Representation for premises licence relating to Co-operative Group Food Ltd, 44A Mill Road, Cambridge, CB1 2AS.

Please find attached the Police representation in regard to the new premises licence application submitted by Ward Hadaway Solicitors on behalf of their client; Co-operative Group Food Ltd., relating to 44A Mill Road, Cambridge. CB1 2AD.

The premises is situated in a cumulative impact area and this representation is in regard to licensing objectives: Prevention Of Crime and Disorder, Public nuisance, Public Safety & the Protection of Children from harm under Licensing Act 2003.

Yours Sincerely,

PC 446 Clare Metcalfe
Licensing Officer for Cambridgeshire Constabulary
Operational Planning and Licensing Department,
Cambridgeshire Constabulary,
Hinchbrook Park,
Huntingdon,
PE29 6NP.



CC [REDACTED]

**THE LICENSING ACT 2003
REPRESENTATION FORM FOR "RESPONSIBLE AUTHORITY"**

Please delete as applicable: **POLICE**

Your name	PC 446 Clare Metcalfe
Job Title	Licensing Officer, Cambridge Constabulary
Postal Address (inc post code)	Operational Planning and Licensing Department, Cambridgeshire Constabulary, Hinchingsbrooke Park, Huntingdon, PE29 6NP
Contact telephone number:	[REDACTED]
Mobile Number:	[REDACTED]
Email address:	[REDACTED]

Name of Premises you are making a representation about:	Co-operative Group Food Ltd,
Address of the premises you are making a representation about:	44A Mill Road, Cambridge, CB1 2AS

This section is about your representation/s. They must relate to one or more of the Licensing Objectives. Please detail the evidence supporting your representation, (under the relevant headings) and the reason for your representation/s. *It is important that you detail all matters that you wish to be considered. (Use additional sheets if necessary). Regulations provide that in considering representations the authority may take into account documentary or other information produced by the party either before the hearing or, with the consent of all parties, at the hearing.*

Which licensing objective(s) does your representation relate to?	Please see below
The prevention of crime and disorder	Public safety
See Below	See Below
The prevention of public nuisance	Protection of Children from Harm
See Below	

Background

The entire length of Mill Road is located within one of Cambridge City Council's Cumulative Impact Zones (CIZ). ([Appendix 1 – shows the Petersfield section of CIZ](#)). It is divided between Petersfield and Romsey Wards, with them being physically separated by a railway line, connected by a road/pedestrian bridge. Mill Road is a major thoroughfare for pedestrians going to and leaving the city centre area at all times of the day and early hours of the morning.

Cambridgeshire Constabulary Licensing Department was approached by Richard Arnot (Partner - Ward Hadaway Solicitors) for pre-application advice. As per the request, the police provided such advice to him. The majority of the recommended conditions, that would help reduce the negative affect on the CIZ have been included in the operating schedule of the application. As part of the pre-application advice I also stated to Mr Arnot that even if all these recommended conditions were included in the application, I was still minded to submit a representation against this application. Due to the fact that Mill Road is an area sensitive to alcohol related issues, and I did not believe the addition of another off-licence outlet on Mill Road would be conducive to Cambridge City Council's Cumulative Impact policy.

Issues associated with area

The problems associated with the area particularly in relation to alcohol related anti-social behaviour and crime, alcohol misuse and public nuisance are well documented. The area continues to attract groups of individuals who live a street life existence. These vulnerable adults, with drink and drug problems lead a chaotic life style. They would no doubt be susceptible to the draw of an additional alcohol outlet. Historically, these people have presented significant challenges at all times of the day to shop staff and other customers by being intimidating and, often ready to offer violence/aggression when challenged or refused service. The condition to deploy a SIA (Security Industry Authority) registered security guard during the hours when alcohol is permitted to be sold, should reduce the problems directed towards shop staff, however this would very much depend on the competency of each individual SIA guard. Additionally, their presence should reduce the risk of alcohol theft, however, this risk would not be negated altogether as it is intended that alcohol products are available for self-service.

Another helpful measure offered by the applicant is the reduced 'Supply of Alcohol' hours (between 11:00-20:00hrs), which would reduce the historical issues associated with people wishing to purchase alcohol in order to 'pre-load' whilst on-route to city centre for an evening/night out. Apart from those who may wish to do so prior to 20:00hrs.

Currently there are a total of ~44 Licensed Premises on Mill Road, made up of on-licences, off-licences and both. 26 (59%) of these premises are along the Petersfield section of Mill Road. This figure represents 42% of the 61 licensed premises in Petersfield Ward. Another general off-licence permitting sale and consumption of alcohol off the premises is not only an unnecessary addition to Mill Road and Petersfield Ward, but also unhelpful in such an alcohol sensitive area. Merely adding to the cumulate impact on the residents and other users.

The CIZ was only last reviewed in January 2021, resulting in Cambridge City Council readopting the existing CIZ's, with the addition of a further area in the north of the city. ([Appendix 2 – Cambridgeshire Constabulary Cumulative Impact Zone Report 2020](#))

Alcohol related incidents

More recent detailed figures show that between 1st March 2019 – 1st March 2020 the police recorded 26 'street based' incidents along the Petersfield section of Mill Road, which were marked as involving alcohol. Though it should be noted that these incidents are dependent upon having been tagged with an 'alcohol marker' which is not reliably the case. Also, please note that these are only incidents reported to the police, and do not include recorded crimes that may have been recorded directly onto the crime recording database rather than being created as an incident.

The vast majority of these incidents refer to: street drinkers being abusive to members of the public, concerns for the safety of people 'passed out' on the path, or persons walking in the road, presenting

a danger to themselves and other road users. Additionally, a number of calls to assist ambulance staff who are trying to assess/treat uncooperative, vulnerable persons who are under the influence of alcohol/drugs. ([Appendix 3 – Table of alcohol related incidents report to police between 1st March 2019 – 1st March 2020](#)).

Effect of Coronavirus pandemic on police incident/crime reports

The last year or so have been unprecedented times, with the Coronavirus global pandemic taking hold. To date, this has resulted in three National Lockdowns and regional tiers being introduced around the country. These measures restricted the ability of many businesses to open, and altered people's day to day movements. To this end, the demands on policing over this period have also altered, resulting in the change to the types of incidents reported and recorded crime trends. Due to this there would be no benefit in police providing more up to date data, past 1st March 2020. There is no reason to believe that once the economy fully reopens and the nation gets back to 'normality' that there will be any significant change to the pre-pandemic crime/incident levels.

Additional preventative measure - PSPO

The existence of Cambridge City Councils' Public Spaces Protection Order (PSPO), which is valid until 31st May 2022, reaffirms the belief that the local area still suffers from alcohol related anti-social behaviour and crime, which has a significant impact on the lives of residents and other locals.

The areas covered by the PSPO are: Petersfield Green (locally known as Donkey Common), Mill Road Cemetery and the front garden to Ditchburn Place. The PSPO prohibits a person from consuming alcohol or having an open container of alcohol in their possession. Unfortunately, the location of this Co-op store is literally situated directly opposite the entrance to Mill Road Cemetery. ([As shown in Appendix 4](#)).

Question

I would like to seek clarification, as to whether the applicant intended to include the condition:

- All spirits are to be displayed behind a secure checkout area to which the public do not have access (so not available for self service).

The reason for the question is that the annotation on plan drawing (submitted alongside the application) appears to suggest this?

Summary

Despite the inclusion of conditions and other measures, volunteered by the applicant, (which will undoubtedly reduce the impact of the licensed premises), it is still true to say that it is hard to believe how any degree of control can be exercised by the premises over its customers that effectively walk away with the alcohol.

Once having left the premises they are at liberty to do whatever they wish, without any possible intervention from the licensee to negate the risk of adding to the cumulative impact.

The special policy relating to cumulative impact zones within the city, creates a rebuttable presumption that applications which are likely to add to the existing cumulative impact will normally be refused, if relevant representations are received about the cumulative impact on the licensing objectives. Unless the applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact already being experienced.

Though the applicant has included some robust conditions and reduced 'Supply of Alcohol' hours, the police do not believe that the application submitted addresses the rebuttable presumption sufficiently for the premises licence to be granted. Therefore, we object against this application for an off-licence, and I feel it is entirely appropriate that this decision is made by the Licensing Sub-Committee members.


If the committee were minded to grant the licence, the police would recommend the additional conditions listed in [Appendix 5](#) in an attempt to further reduce the impact on the local area. Particularly, condition 1 - *All alcohol to be displayed behind a secure checkout area to which the public do not have access.*

One other off-licence (in the city centre CIZ) is subjected to a similar worded condition.

This requirement will make the premises far less attract to those people inclined to steal alcohol, and more importantly will provide the staff with another 'line of defence' to prevent selling alcohol to intoxicated customers. As this arrangement would require a verbal interaction between all customers purchasing alcohol and the serving staff, thus giving the staff member verbal and non-verb indicators that the customer may be intoxicated, reinforcing their justification to refusal of sale.

Evidence presented in support of this representation may comprise of, although not exclusively, first-hand knowledge of the local neighbourhood sergeant for Cambridge East, and statistical analysis of alcohol related incidents.

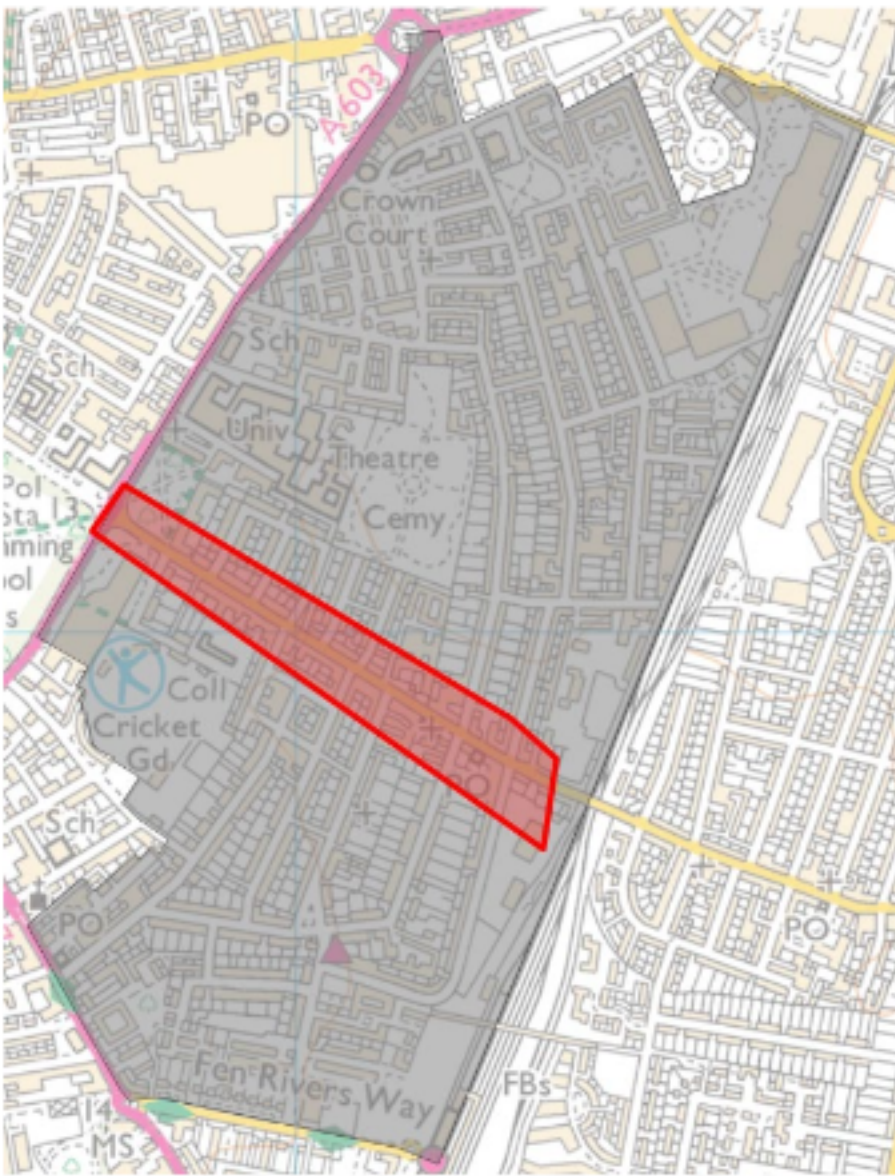
The Delegation of responsibilities by the Chief Officer of Police is shown in [Appendix 6](#).

Signed  Date: 18/03/2021

APPENDICES

1. Map showing Petersfield section of Cumulative Impact Zone.
2. Cambridgeshire Constabulary Cumulative Impact Zone Report 2020
3. Table of alcohol related incidents report to police between 1st March 2019 – 1st March 2020).
4. Public Spaces Protection Order (PSPO) map, showing location of the proposed licenced premises.
5. Recommended conditions.
6. Delegation of Responsibilities.

Appendix 1 – Petersfield section of Cumulative Impact Zone.



Appendix 2 - CAMBRIDGE CITY CUMULATIVE IMPACT POLICY REVIEW 2020

Three years data has been analysed, though it should be noted that we are dependent upon crimes and incidents having an 'alcohol' marker which is not reliably the case. Additionally, in May 2018 Cambridgeshire Constabulary converted to a new Crime recording system, which again required an 'alcohol' qualifier to be recorded against a crime for it to be included in these statistics. These figures relate to all alcohol related crimes and incidents recorded within the Cambridge Ward areas that have been identified using the recording systems – 'Crime File', 'Command & Control 3' and 'Athena'.

From the information that is recorded below, it can be seen that in Cambridge there is a general correlation between the ward areas with the highest number of licenced premises and the number of alcohol related crime and incidents.

WARD	Licenced Premises
Market	245
Petersfield	62
Trumpington	51
Abbey	33
Coleridge	32
Castle	32
Newnham	32
Romsey	26
King's Hedges	24
Arbury	24
Cherry Hinton	22
East Chesterton	16
West Chesterton	14
Queen Edith's	11
TOTAL	624

Alcohol Related Crime and Incidents				
WARD	Apr2017- Mar2018	Apr2018- Mar2019	Apr2019- Mar2020	TOTAL
Market	1151	714	813	2678
Petersfield	254	188	228	670
Trumpington	195	182	228	605
King's Hedges	198	133	199	530
Abbey	159	160	198	517
West Chesterton	150	157	185	492
East Chesterton	158	100	160	418
Arbury	163	121	111	395
Coleridge	144	108	141	393
Romsey	104	92	108	304
Queen Edith's	126	68	85	279
Cherry Hinton	79	59	77	215
Castle	74	53	58	185
Newnham	45	33	37	115
TOTAL	3000	2168	2628	7796

There has been an overall ~12% decrease in the number of alcohol related crimes and incidents recorded in Cambridge between April 2017-March 2018, and April 2019-March 2020.

The table below shows the highest 15 streets in Cambridge for reports of alcohol related crimes and incidents between April 2017 – May 2020. Ten of these streets being located within the existing City Centre Cumulative Impact Zone (CIZ). Hills Road and Mill Road also located in existing CIZs.

ROAD NAME	Crimes & Incidents April 2017 - May 2020	WARD
St Andrews Street	382	Market
Mill Road	232	Petersfield/Romsey
Hills Road	215*	Petersfield/Trumpington/Coleridge
Chesterton Road	211	West Chesterton/Arbury
Sidney Street	201	Market
Downing Street	200	Market
Regent Street	198	Market
Newmarket Road	165	Abbey
Milton Road	158	West Chesterton/Kings Hedges
East Road	143	Market
Parkside	136	Market
Lion Yard	117	Market
Guildhall Place	116	Market
Rose Crescent	116	Market
Market Hill	107	Market

* excluding alcohol related crimes and incidents recorded at Addenbrookes hospital, Hills Road.

MARKET WARD

The main hot spot areas for alcohol related crime and incidents in Market Ward, are focused on St. Andrews Street, Sidney Street, Downing Street and Regent Street. With St. Andrews Street accounting for 14% of all the alcohol related crime and incidents in Market Ward. Sidney Street, Downing Street and Regent Street all account for approximately ~7% respectively. This shows a continued requirement for the presence of the current city centre CIZ.

COLERIDGE

Coleridge Ward has seen a small reduction of ~7% in the overall alcohol related crime and incidents from the period March 2014- February 2017 to March 2017- February 2020. However, over the same period the percentage of these crimes and incidents occurring on the Cambridge Leisure Park has seen a significant reduced from 30% to only ~9%, indicating that the presence of the current CIZ has been effective.

PETERSFIELD/ROMSEY

Despite the combined figures for these two wards showing a ~5% reduction in the overall alcohol related crime and incidents from the period March 2014- February 2017 to March 2017- February 2020. There are still two 'hotspot' areas, namely; Mill Road and Hills Road.

Mill Road:

- A total of 232 (~22%) of all recorded alcohol related incidents and crimes in Petersfield and Romsey Wards occurs on Mill Road.
- There is a total of 44 Licensed Premises on Mill Road, made up of premises with on-licences, off-licences and both.
- Between 1st March 2019 – 29th February 2020 the police recorded 26 'street based' alcohol related incidents (not crimes) along the Petersfield section of Mill Road. The vast majority of these incidents refer to: street drinkers being abusive to members of the public, concerns for the safety of people 'passed out' on the path, or persons

walking in the road, presenting a danger to themselves and other road users. Additionally, a number of calls to assist ambulance staff who are trying to assess/treat uncooperative, vulnerable persons who are under the influence of alcohol/drugs.

PETERSFIELD AND TRUMPINGTON

Hills Road:

- Over the 3-year period a total of 215 (~12%) of all alcohol related crimes and incidents within the Wards of Petersfield, Coleridge and Trumpington were recorded along Hills Road, not including those recorded as occurring at Addenbrookes hospital, Hills Road.
- The vast majority of these records indicate that the offending party was intoxicated, resulting in violent behaviour, with some leading to an assault, or displaying aggressive behaviour in a public place.

It is evident from the general downward trend in alcohol related crime and incidents that current CIZs are effective and are having a positive impact. However, the previously identified hotspots for these types of crimes and incidents continue to be problematic areas in Cambridge City, and therefore it is recommended that the current Cumulative Impact Zones remain in place.

WEST CHESTERTON

It should be noted that over the last 3 years the statistics show that Chesterton Road is a hotspot area for alcohol related crimes and incidents.

There is a small section of Chesterton Road within Arbury Ward, but its majority is in West Chesterton Ward. Chesterton Road features 4th in the table for the highest alcohol related crimes and incidents which is concerning as it isn't located within any of the existing CIZ. The city centre CIZ borders the southern bank of the River Cam, and Chesterton Road is located just north of the river.

As a comparison with Mill Road, between 1st March 2019 – 29th February 2020 the police recorded 21 'street based' alcohol related incidents (not crimes) along Chesterton Road.

The vast majority of this incidents refer to incidents involving street drinkers being abusive to members of the public and shop staff, begging, fighting amongst themselves. Additionally, as with Mill Road we have recorded a number of calls to assist ambulance staff who are trying to assess and treat unwilling, vulnerable people who are under the influence of alcohol or drugs.

The majority of these reports are centred around the 'Mitcham's Corner' area, and roads leading off it. The areas include; the parade of shops and businesses on Milton Road (as far as Springfield Terrace), the section of Chesterton Road from Croft Holme Lane, along to Ferry Path, and the section of Victoria Avenue, north of the River Cam.

There appears to be disproportionally high level of alcohol related crimes and incidents in this area of the West Chesterton ward, considering it only has 14 licensed premises. However, a high percentage of these premises are located within this 'hot spot' area. ~23%

of all recorded alcohol related crimes and incidents occur along Chesterton Road. Therefore, consideration should be given to extending the city centre CIZ to include this area, or to create a new CIZ for this relatively small geographical area.

Appendix 3 - Table of alcohol related incidents report to police between 1st March 2019 – 1st March 2020).

This list only shows alcohol related incidents reported to police for the Petersfield section of Mill Road / Cemetery entrance.

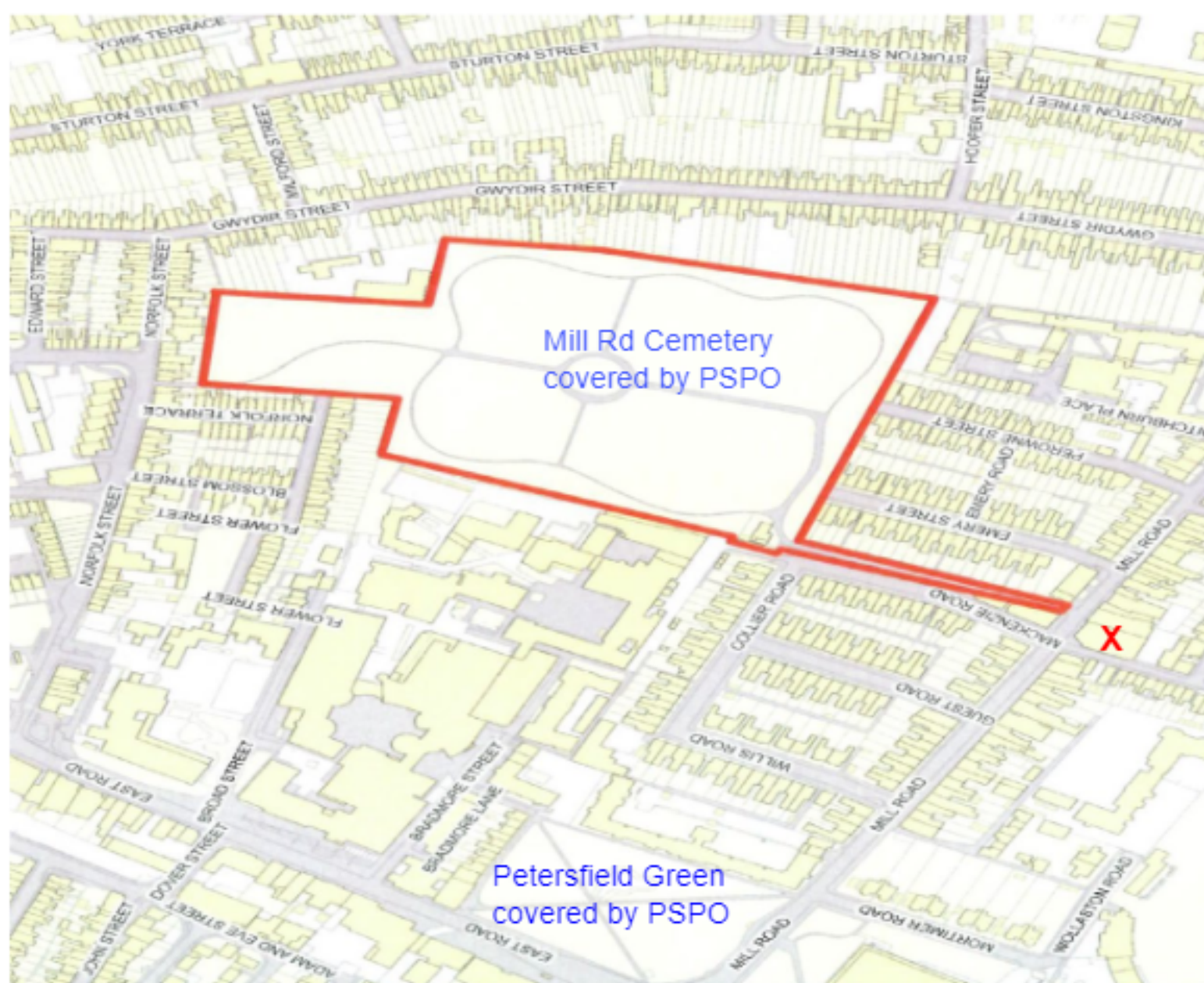
Search parameter using C&C3 Global: incidents on Mill Road, with alcohol marker between 01/03/19 - 01/03/20.

This doesn't include alcohol related crimes that have been recorded directly onto Athena.

date	time	inc no.	Type of inc
09/03/2019	15:38	0366	Rowdy/Nuisance - Drunk male begging and accosting members of public.
14/03/2019	12:51	0212	Rowdy/Nuisance - Street drinkers, begging outside shops
12/04/2019	12:11	0184	Rowdy/Nuisance - intoxicated male being verbally abusive and intimidating to people in Mill Road Cemetery.
03/05/2019	09:55	0098	Rowdy/Nuisance - intoxicated male being verbally abusive to pedestrians. Male arrested for Drunk and Disorderly.
16/05/2019	13:03	0221	Rowdy/Nuisance - Intoxicated street life female being abusive to passing members of the public.
17/05/2019	18:42	0414	Rowdy/Nuisance - Intoxicated street life female shouting and aggressively begging.
24/05/2019	14:19	0260	Safety/Concern - intoxicated/drugged male walking in middle of Mill Road, swearing & shouting at people.
01/06/2019	10:46	0166	Nuisance - intoxicated male laying on path. Appears to have defecated, ambulance called and dealing.
19/06/2019	21:49	0555	Safety/Concern - Two drunk males following and shouting at I/P. Male matching description found, words of advice provided as no complaint.
23/06/2019	00:04	0002	Criminal damage - drunk street life female has entered licensed premises causing damage and assaulting staff. Crime raised
15/07/2019	17:47	0379	Street drinking - heavily intoxicated, agitated street life male laying on pavement, ambulance dealing.
22/07/2019	13:27	0234	Sus. Circs - 4x drunk males taking drugs at rear of shop. Customer with her young children has informed shop owner. Informant states that they are regularly picking up used needles and rubbish in location. Drunk males located by PCSO, woa given, no offences revealed.
28/08/2019	20:52	0475	Concern - Call from ambulance. Drunk male lying in road refusing to move. Police attendance cancelled as male went with ambulance.
16/09/2019	08:36	0094	Concern - Intoxicated male walking in road. Area search no trace.
16/09/2019	11:58	0187	Rowdy/Nuisance - Street life female sitting in outside shop in sleeping bag, being abusive the passers by. Empty bottle of vodka next to her. Moved on by police.
21/09/2019	01:17	0034	Rowdy/Nuisance - Drunk male on bench being abusive to I/P. Male left location so no requirement for police attendance.
27/09/2019	00:29	0006	Rowdy/Nuisance - Drunk male has climbed on top of a car that has stopped at pedestrian crossing. Area search no trace.
04/12/2019	17:11	0378	Concern - Very drunk, aggressive male & dog keep running into road. He has a bottle of alcohol in his hand. Male located by police and was collected by relative.
19/12/2019	23:18	0499	Ambulance assistance - a drink, naked highly agitated male being aggressive to paramedics. Police attended, male calmed and attended hospital in ambulance.
22/12/2019	19:25	0418	Concern - Drunk female walking in and out of traffic. Female located and removed from area.
22/12/2019	20:45	0455	Rowdy/Nuisance - Drunk male smashed window and cuts to wrist as a result. Transported to hospital, assaulted police at hospital. Crimes raised.

28/12/2019	18:26	0336	Rowdy/Nuisance - street life female walking up Mill Road with bottle in hand, shouting abuse. Area search no trace.
11/01/2020	21:02	0456	Rowdy/Nuisance - 2x drunk males entered restaurant threatening customers & staff. They have left prior to police attendance. Crime raised assault.
11/02/2020	21:48	0499	Concern - Drunk male passed out on pavement, got up and is deliberately walking in and out of traffic. Keeps falling over. Area search no trace.
27/02/2020	14:46	0257	Concern - Very drunk street life male has entered shop and collapsed, refusing to attend hospital with ambulance. No requirement for police, male has left scene.
01/03/2020	18:03	0395	Rowdy/Nuisance - large group of very drunk, street life males are causing a nuisance. They are becoming increasingly annoyed when they are refused service in a supermarket, which is upsetting staff and other customers. Police attended and group located. No offences revealed and group dispersed with woa given.

Appendix 4 - Public Spaces Protection Order (PSPO) map.



X - Indicates location of premises

Appendix 5 - Recommended conditions.

1. All alcohol to be displayed behind a secure checkout area to which the public do not have access (not available for self service).
2. All alcohol sold will be clearly labelled with the name and postcode of the premises, so it is easily identifiable after purchase.

Appendix 6 - Delegation of Responsibilities.



Creating a safer
Cambridgeshire

Licensing Act 2003

Delegation of responsibilities by the Chief Officer of Police

In accordance with the provisions of the Licensing Act 2003 I hereby delegate authority to Cambridgeshire Constabulary Licensing Officers to develop policies and procedures and to exercise all powers vested in the Chief Constable of Cambridgeshire Constabulary. Such delegation to include the power to delegate specific tasks to licensing Constables and support staff.

This delegation shall remain in force unless otherwise notified.

Signed



Nick Dean
Chief Constable
Cambridgeshire Constabulary
1 October 2018